

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

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|                             |   |                            |
|-----------------------------|---|----------------------------|
| M CORP DBA 11:59,           | : |                            |
|                             | : |                            |
| Plaintiff,                  | : |                            |
|                             | : |                            |
| v.                          | : |                            |
|                             | : | Civil Action: 1:24-cv-1823 |
| INFINITIVE, INC., JOSEPH    | : |                            |
| BRADLEY SHERIDAN,           | : |                            |
| DATABRICKS INC., WILLIAM    | : |                            |
| McKINNEY, CHERYL MILES, AND | : |                            |
| DOES 1-25, INCLUSIVE.       | : |                            |
|                             | : |                            |
| Defendants.                 | : |                            |

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|-----------------------------|---|--|
| INFINITIVE, INC.            | : |  |
|                             | : |  |
| Counter-Plaintiff,          | : |  |
|                             | : |  |
| vs.                         | : |  |
|                             | : |  |
| M CORP DBA 11:59 and ALISON | : |  |
| MOYE,                       | : |  |
|                             | : |  |
| Counter-Defendants.         | : |  |

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**CONSENT MOTION OF THE PARTIES TO EXTEND TIME FOR COUNTER-  
DEFENDANTS TO PROVIDE RULE 26(b) DISCLOSURES**

COME NOW Plaintiff/Counterclaim Defendant M Corp DBA 11:59 (“11:59”), and Counterclaim Defendant Alison Moye (“Moye”) by their undersigned joint counsel with the consent of Defendant/Counterclaim Plaintiff Infinitive, Inc. (“Infinitive”), to provide Rule 26(a) Disclosures to the parties for the reasons set forth below:

1. Moye is a new party to this litigation, which was originally initiated by a Verified Complaint on October 15, 2024. Moye was added as a party by way of Infinitive's Counterclaims, filed on May 23, 2025. Moye was served with summons on May 28, 2025.

2. Moye has retained the undersigned counsel for 11:59, her employer, to represent her in this litigation.

3. 11:59 initially served Amended Initial Disclosures on or about May 29, 2025, which included updated analysis on 11:59's damages and insurance coverage as to Infinitive's counterclaims.

4. Defendant/Counterclaim Plaintiff, Infinitive, served Amended Initial Disclosures on June 6, 2025.

5. 11:59 and Moye are in the process of preparing supplemental Amended Initial Disclosures pursuant to Fed. R. Civ. P. 26(a)(1), to further incorporate and respond to Infinitive's Counterclaims.

6. 11:59 and Moye believed they were in compliance, and immediately upon learning of the requirement to supplement, commenced working on Second Amended Initial Disclosures, but unfortunately were unable to serve same by the June 6, 2025 deadline.

7. Counter-Defendants Moye and 11:59 respectfully request until June 13, 2025 to serve Second Amended Initial Disclosures. Infinitive, by counsel, has consented to this request.

8. The request is not made for purposes of delay and will not delay the case or cause prejudice to any party.

9. The parties waive hearing on this Motion.

For the foregoing reasons 11:59 and Moye request that this Motion be granted.

*[Signatures on next page]*

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*Alison Moye*

Date: June 12, 2025